



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Dick Bratton, Treasurer
Wyoming Republican State Committee
P.O. Box 241
Casper, WY 82602

FEB 12 1997

Identification Number: C00005785

Reference: 30 Day Post-General Report (10/1/96-11/25/96)

Dear Mr. Bratton:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please clarify all expenditures made for Advertising, Radio Advertising and Television Buy on Schedules B and H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B, E or F supporting Line 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-Schedule D of your report has failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and end of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report by providing the nature of debt. 11 CFR §104.11

-On Schedule H3 supporting Line 18 of the Detailed Summary Page, you have failed to include a DATE OF RECEIPT for the \$3,471.73 transfer-in from the RNC Non-Federal Operating Account. Please amend your report to include this date. 11 CFR §104.10

WYOMING REPUBLICAN STATE COMMITTEE

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-Schedule H3 of your report (pertinent portions attached) discloses in-kind transfers from the RNC Non-Federal Operating Account to pay for Administrative/Voter Drive expenses of your committee. Please note that 11 CFR 106.5 (g)(1)(i) permits a committee to "pay the entire amount of an allocable expense from its federal account and shall transfer from its non-federal account to its federal account solely to cover the non-federal share of that allocable expense" (emphasis added). As the RNC Non-Federal Operating Account not a non-federal account of your committee, such transfers are prohibited.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

WYOMING REPUBLICAN STATE COMMITTEE
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-Schedule A of your report (pertinent portions attached) discloses an apparent contribution(s) from a from a corporation(s). 2 U.S.C. §441b(a)) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received a corporate contribution(s), you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all transfers-out and refunds should be made within thirty days of the treasurer's receipt of the impermissible funds. In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-Schedule A of your report discloses \$17,447.48 in in-kind contributions to your committee from Targeted Creative Communications. Please be advised that in addition to disclosing in-kind contributions as a receipt on Schedule A, the value of the in-kind contributions must be added to the operating expenditures total on Line 21, in order to avoid inflating the cash-on-hand amount. 11 CFR §104.13(a)(2) Please amend your report by itemizing the in-kind contributions on Schedule B or H4, supporting Line 21 of the Detailed Summary Page.

WYOMING REPUBLICAN STATE COMMITTEE

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A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in black ink, appearing to be "NE" followed by a stylized flourish.

Neil Evans
Reports Analyst
Reports Analysis Division

RECEIPT SCHEDULE H3
 (effective 1/1/91)

**TRANSFERS FROM
NON-FEDERAL ACCOUNTS**

 PAGE 2 OF 4
 FOR LINE 18

NAME OF COMMITTEE			TOTAL AMOUNT TRANSFERRED	
Wyoming Republican State Committee				
NAME OF ACCOUNT		DATE OF RECEIPT		
RNC Non-Federal Operating Account		10/25/96	\$ 1,073.75	
In-kind Transfer	BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT		EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
1) Total Administrative/Voter Drive	1,073.75			
2) Direct Fundraising (List Events-Amount for Each)				
a)				
b)				
c)				
d)				
e) Total Amount Transferred For Direct Fundraising				
3) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)				
a)				
b)				
c)				
d)				
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support				
NAME OF ACCOUNT		DATE OF RECEIPT		
RNC Non-Federal Operating Account		10/25/96	\$ 4,397.52	
In Kind Transfer	BREAKDOWN OF TRANSFER RECEIVED			
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT		EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT
1) Total Administrative/Voter Drive	4,397.52			
2) Direct Fundraising (List Events-Amount for Each)				
a)				
b)				
c)				
d)				
e) Total Amount Transferred For Direct Fundraising				
3) Exempt Activity/Direct Candidate Support (List Events-Amount For Each)				
a)				
b)				
c)				
d)				
e) Total Amount Transferred For Exempt Activity/Direct Candidate Support				
TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED				
	ADMIN/VOTER DRIVE AMOUNT	DIRECT FUND-RAISING AMOUNT	EXEMPT ACTIVITY/DIRECT CANDIDATE SUPPORT	
SUBTOTAL THIS PAGE	5,471.27	--	5,471.27	
TOTAL THIS PERIOD			60,251.75	

RECEIPT SCHEDULE H3
 (effective 1/1/91)

**TRANSFERS FROM
NON-FEDERAL ACCOUNTS**

PAGE	OF
3	4
FOR LINE 18	

NAME OF COMMITTEE

TOTAL AMOUNT
TRANSFERRED

Wyoming Republican State Committee

NAME OF ACCOUNT

DATE OF RECEIPT

RNC Non-Federal Operating Account

10/23/96

\$ 1,002.06

In-kind Transfer

BREAKDOWN OF TRANSFER RECEIVED

ADMIN/VOTER
DRIVE AMOUNTDIRECT FUND-
RAISING AMOUNTEXEMPT
ACTIVITY/DIRECT
CANDIDATE
SUPPORT

i) Total Administrative/Voter Drive

1,002.06

ii) Direct Fundraising (List Events-Amount for Each)

a)

b)

c)

d)

e) Total Amount Transferred For Direct Fundraising

iii) Exempt Activity/Direct Candidate Support

(List Events-Amount For Each)

a)

b)

c)

d)

e) Total Amount Transferred For Exempt Activity/Direct
Candidate Support

NAME OF ACCOUNT

DATE OF RECEIPT

RNC Non-Federal Operating Account

\$ 3,471.73

In-kind Transfer

BREAKDOWN OF TRANSFER RECEIVED

ADMIN/VOTER
DRIVE AMOUNTDIRECT FUND-
RAISING AMOUNTEXEMPT
ACTIVITY/DIRECT
CANDIDATE
SUPPORT

i) Total Administrative/Voter Drive

3,471.73

ii) Direct Fundraising (List Events-Amount for Each)

a)

b)

c)

d)

e) Total Amount Transferred For Direct Fundraising

iii) Exempt Activity/Direct Candidate Support

(List Events-Amount For Each)

a)

b)

c)

d)

e) Total Amount Transferred For Exempt Activity/Direct
Candidate Support

TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED

ADMIN/VOTER
DRIVE AMOUNTDIRECT FUND-
RAISING AMOUNTEXEMPT
ACTIVITY/DIRECT
CANDIDATE
SUPPORT

SUBTOTAL THIS PAGE

4,473.79

4,473.79

TOTAL THIS PERIOD

64,725.54

0000035374

Line: 12

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE
WYOMING REPUBLICAN STATE COMMITTEE

A. Republican National Committee
310 First Street, Southeast
Washington, DC 20003

EMPLOYER

DATE
10/07/96AMOUNT
5,000.00

OCCUPATION

Receipt for: *TRANSFER*

Aggregate YTD: \$ 25,771.91

B. Republican National Committee
310 First Street, Southeast
Washington, DC 20003

EMPLOYER

DATE
10/14/96AMOUNT
6,450.00

OCCUPATION

Receipt for: *TRANSFER*

Aggregate YTD: \$ 32,221.91

C. Targeted Creative Communication
801 N. Fairfax St. Suite 308
Alexandria, VA 22314

EMPLOYER

DATE
10/23/96AMOUNT
1,758.00

OCCUPATION

Receipt for: In-kind transfer
consulting fees

Aggregate YTD: \$ 1,758.00

D. Targeted Creative Communications
801 N. Fairfax St. Suite 308
Alexandria, VA 22314

EMPLOYER

DATE
10/23/96AMOUNT
6,090.75

OCCUPATION

Receipt for: In-kind transfer
consulting fees

Aggregate YTD: \$ 7,848.75

E. Targeted Creative Communications
801 N. Fairfax St. Suite 308
Alexandria, VA 22314

EMPLOYER

DATE
10/25/96AMOUNT
1,883.78

OCCUPATION

Receipt for: In-kind transfer
consulting fees

Aggregate YTD: \$ 9,732.53

F. Targeted Creative Communications
801 N. Fairfax St. Suite 308
Alexandria, VA 22314

EMPLOYER

DATE
10/25/96AMOUNT
7,714.95

OCCUPATION

Receipt for: In-kind transfer
consulting fees

Aggregate YTD: \$ 17,447.48

G.

EMPLOYER

DATE

AMOUNT

OCCUPATION

Receipt for:

Aggregate YTD: \$

SUBTOTAL of Receipts This Page (optional)

28,897.48

TOTAL This Period (last page this line number only)

28,897.48

